

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Muhammad K. Abbasi

Debtor(s)

**Nationstar Mortgage LLC d/b/a Mr. Cooper
Movant**

vs.

Muhammad K. Abbasi

Respondent(s)

BK NO. 20-13321 ELF

Chapter 13

Hearing Date: 09/22/2020

**OBJECTION OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER
TO CONFIRMATION OF CHAPTER 13 PLAN**

Nationstar Mortgage LLC d/b/a Mr. Cooper (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. The claims bar date is October 21, 2020. Secured Creditor intends to file a claim on or before the bar date with pre-petition arrears estimated at \$3,326.81.
2. Debtor's Plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$3,326.81, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Nationstar Mortgage LLC d/b/a Mr. Cooper, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: September 8, 2020

By: **/s/ Rebecca A. Solarz, Esquire**

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